



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

April 29, 2013

[REDACTED]
3909 NE 134th Street
Vancouver, Washington 98686

Re: The Environmental Protection Agency Comments on the Bonneville Power Administration I-5 Corridor Reinforcement Draft Environmental Impact Statement.

Dear Mr. [REDACTED]:

Thank you for your recent letter regarding our comments on the Bonneville Power Administration I-5 Corridor Reinforcement Project. We appreciate that you took the time to contact us with your concerns. With this letter we hope to clarify our comments on the project Draft Environmental Impact Statement.

A principle clarification is that our comments are not intended to endorse nor recommend any of the action alternatives. Rather, our intent with these comments is to assist the lead federal agency in identifying the environmentally preferred alternative in accordance with guidance from the EPA and the Council on Environmental Quality. Per guidance from CEQ,¹ the environmentally preferred alternative is the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources. As you noted in your letter, our comments indicated that additional information is needed to effectively evaluate the significance of impacts. Based on the information in the Draft Environmental Impact Statement, we offered our assessment and rationale for why we believe the West Alternative may be the environmentally preferable alternative. The identified information gaps (such as baseline information for the West Alternative regarding number of homes within 500 feet of the right-of-way, and wetland function) may have bearing on the final identification of the environmentally preferred alternative.

Another key clarification is that although the National Environmental Policy Act requires the identification and disclosure of the environmentally preferred alternative,² it does not require the adoption of the environmentally preferred alternative. Lead federal agencies often select an alternative other than the environmentally preferred alternative based on factors such as the ability of the alternative to meet project purpose and need, overall feasibility, and social, cultural, or economic factors.

In our comments, we recognized that a lead agency's preferred alternative may differ from the environmentally preferred alternative. Should BPA select an alternative other than the environmentally preferred alternative, NEPA directs that they should lay out a clear rationale for the selection of that alternative. The I-5 Corridor Reinforcement is a difficult project that represents potential impacts to multiple resource values. We expect that BPA will identify the alternative that best fulfills the purpose

¹ <http://ceq.hss.doe.gov/nepa/regs/40/40p3.htm>


² 40 CFR 1505.2(b)

and need of the project while minimizing impacts to resource values (including social and economic values) to the maximum extent practicable.

Finally, we appreciate your comments about electromagnetic fields. In our scoping comments on this project we recommended that the DEIS disclose any concerns regarding public health or environmental effects from EMF generated by the transmission line. We also recommended that the project evaluate EMF buffer needs where the line would be located near residences or other public facilities. We reviewed the DEIS for adequacy in addressing these comments. Because we were satisfied by the level of information and analysis presented in Chapter 8 of the DEIS, we did not raise this as an issue in our comments. We continue, however, to prioritize human health in this and all of our work. [REDACTED]

Again, thank you for contacting us with your concerns, and for the opportunity to respond. If you would like to have further conversation about this project, you may contact me at 206-553-1601 or by email at reichgott.christine@epa.gov, or you may contact Teresa Kubo of my staff at 503-326-2859 or by email at kubo.teresa@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine B. Reichgott". To the right of the signature is a small, dark rectangular redaction mark.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit